

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

CHARLENE CARTER,  Plaintiff,  v.  SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,  Defendants.	Civil Case No. 3:17-cv-02278-X
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**CARTER’S OBJECTIONS TO SOUTHWEST’S COUNTER DESIGNATIONS  
FOR BRETT NEVAREZ**

Pursuant to this Court’s Electronic Order, Dkt. 336, Plaintiff Charlene Carter hereby submits her objections to the counter designations of the deposition of Brett Nevarez by Defendant Southwest Airlines Co. (“Southwest”).

**Counter Designation Objections**

Carter offers the following objections to the counter designations of the deposition of Brett Nevarez by Southwest:

**Deposition of Brett Nevarez**

<b>Testimony</b>	<b>Objection</b>
32:15-33:2	This testimony is hearsay. It is introduced for the truth of what Audrey Stone told Mr. Nevarez hours before.
33:8-33:24	This testimony is irrelevant. Fed. R. Evid. 402. The fact that some other employee reported Nevarez for union-related activity is not relevant and risks jury confusion. Fed. R. Evid. 403.
33:25-34:3	This testimony calls for a legal conclusion.

DATED: July 11, 2022

Respectfully submitted,

/s/ Matthew B. Gilliam

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**ATTORNEYS FOR PLAINTIFF  
CHARLENE CARTER**

**Certificate of Service**

I hereby certify that on July 11, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Matthew D. Hill